BEFORE THE ADMINISTRATIVE HEARING COMMISSION
STATE OF MISSOURI

W. DALE FINKE, Director)
Department of Insurance)
State of Missouri,)
)
            Petitioner,)
)
vs.)   Case No.: 06-0331176C
)
GERALD FRANKS,)
)
            Respondent.)
)
        Serve at:)
        1211 Mayview Avenue)
        Independence, Missouri 64057)
        (816) 547-3840)

COMPLAINT

W. Dale Finke, Director of the Missouri Department of Insurance, for his

Complaint against Respondent, Gerald Franks, states as follows:

INFORMATION RELEVANT TO ALL COUNTS

1.   Petitioner is the Director of the Missouri Department of Insurance ("the

Director"), whose duties include, pursuant to Chapter 374 of the Revised Statutes of

Missouri, the regulation, supervision and discipline of bail bond agents.

2.   Respondent was issued general bail bond agent's license on August 31,

2004 (no. 334955) which is currently in active status with an expiration date of August

31, 2007.

3.   The Commission has jurisdiction of this Complaint pursuant to RSMo §

621.045.

COUNT I

4.   Respondent has pleaded guilty to a felony, a ground for discipline of respondent's license under RSMo § 374.755.1(2) (Cumm. 2005).
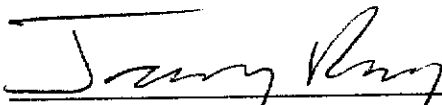
5.   The facts are as follows:

    a.   On or about February 7, 2006, in the Circuit Court of Daviess County, State of Missouri, Division II (case no.: CR305-63F), Respondent pleaded guilty to the charge of Possession of a Controlled Substance pursuant to RSMo § 195.202 for possession of greater than 35 grams of marijuana on or about July 22, 2005.

    b.   Such crime is a felony.

6.   The foregoing action comprises grounds to discipline Respondent's General Bail Bond Agent's license under RSMo § 374.755.1(2).

WHEREFORE, Petitioner respectfully requests this Commission find cause to discipline Respondent's General Bail Bond Agent's license.

Respectfully submitted,

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